

-1163 Case, United States Patent No. 7,551,731 (Disputed)		
Claim Term/Phrase	Plaintiff's Construction	Defendant's Construction
(Proposed by Defendant)		minute, second, or day (as opposed to an appropriate time)"

-1164 Case, United States Patent No. 8,209,411 (Disputed)		
Claim Term/Phrase	Plaintiff's Construction	Defendant's Construction
“messaging gateway” (Claims 1, 10, 18) (Proposed by Defendant)	Plain and ordinary meaning	“a device or program to connect disparate computer network environments and deliver content from the first network environment to a specific apparatus in the second network environment”

-1165 Case, United States Patent No. 8,280,928 (Disputed)		
Claim Term/Phrase	Plaintiff's Construction	Defendant's Construction
“directory” (Claims 1, 13) (Proposed by Defendant)	The preambles of claims 1 and 13 do not recite “directory” as a limitation.	“An entity in a file system which contains a group of files and/or other directories”
“identifying a single initial descriptor that links a plurality of descriptors and two or more predecessor descriptors linking another single descriptor” (Claims 1, 13) (Proposed by Defendant)	Plain and ordinary meaning	“identifying a single initial descriptor in a first level of the hierarchy, the single initial descriptor linked to a plurality of descriptors in a second level of the hierarchy, the plurality of descriptors linked to two or more predecessor descriptors in a third level of the hierarchy, and the two or more predecessor descriptors linked to another single initial descriptor that is in a fourth level of the hierarchy”

-1166 Case, United States Patent No. 8,335,819 (Disputed)		
Claim Term/Phrase	Plaintiff's Construction	Defendant's Construction
“first time request” (Claims 1, 8, 16) (Proposed by Defendant)	Plain and ordinary meaning	“a request before a client-side persistency file has been created or a request where no previous session information exists”

-1166 Case, United States Patent No. 8,335,819 (Disputed)		
Claim Term/Phrase	Plaintiff's Construction	Defendant's Construction
<p>“scripting file” (Claims 1-2, 5, 7-9, 12, 14, 16-17)</p> <p>(Proposed by Defendant)</p>	Plain and ordinary meaning	“file written in a scripting language that is interpreted at runtime instead of being compiled into machine language instructions”

-1167 Case, United States Patent No. 8,369,827 (Disputed)		
Claim Term/Phrase	Plaintiff's Construction	Defendant's Construction
<p>“Subscriber Profile Repository (SPR)” (Claims 1, 14)</p> <p>(Proposed by Defendant)</p>	Plain-and-ordinary meaning; the preambles of claims 1 and 14 do not recite “Subscriber Profile Repository (SPR)” as a limitation	“a logical entity containing all subscriber/subscription related information needed for subscription-based policies and Policy and Charging Control rules as defined by the 3GPP standard”

-1168 Case, United States Patent No. 8,391,892 (Disputed)		
Claim Term/Phrase	Plaintiff's Construction	Defendant's Construction
<p>The claimed order of steps 1-4 (Claim 1)</p> <p>(Proposed by Defendant)</p>	Claim 1 does not require a specific order for the steps Salesforce identifies.	The following steps of claim 1 must be executed in the order recited: “stor[ing],” “receiv[ing] a request,” “allow[ing] or deny[ing] access,” and “log[ging] the identity.”

-1169 Case, United States Patent No. 8,923,899 (Disputed)		
Claim Term/Phrase	Plaintiff's Construction	Defendant's Construction
<p>“Session Initiation Protocol (SIP) request” / “SIP request” (Claims 1-2, 6-9, 13-16)</p> <p>(Proposed by Defendant)</p>	Plain and ordinary meaning	“a message conforming to the request message format of the Session Initiation Protocol specification as set forth in RFC 3261 published by the Internet Engineering Task Force”
<p>“RESTful” (Claims 1, 3, 6-8, 10, 13-16)</p> <p>(Proposed by Defendant)</p>	Plain and ordinary meaning	“conforming to the Representational State Transfer (REST) architectural style consisting of architectural elements and a set of constraints applied to the elements of the architecture”

-1170 Case, United States Patent No. 9,088,493 (Disputed)		
Claim Term/Phrase	Plaintiff's Construction	Defendant's Construction
<p>“[A] login of the user with one of the one or more online services” (Claims 1, 5)</p> <p>(Proposed by Defendant)</p>	Plain and ordinary meaning	“an entering of user information in order to access an online service”
<p>“determining ... a pattern of consistent usage from the timing information” (Claims 1, 5)</p> <p>(Proposed by Defendant)</p>	Plain and ordinary meaning	Indefinite, or, in the alternative, “determining, based on applying a set of predefined rules to the timing information, that the user’s usage of an online service is free from variation to a certain degree for a certain time window”
<p>“a consistency of the determined pattern of consistent usage” (Claims 1, 5)</p> <p>(Proposed by Defendant)</p>	Plain and ordinary meaning	Indefinite, or, in the alternative, “the extent to which the previously determined pattern of consistent usage is within a certain tolerance range or time window based on the predefined rules applied to the timing information”

-1171 Case, United States Patent No. 9,277,060 (Disputed)		
Claim Term/Phrase	Plaintiff's Construction	Defendant's Construction
<p>“event” (Claims 1, 5, 8, 9, 11, 17, 18, 21)</p> <p>(Proposed by Defendant)</p>	Plain and ordinary meaning	“communication associated with an identifier”
<p>“log(s)” (Claims 1, 2, 3, 11, 17, 21)</p> <p>(Proposed by Defendant)</p>	Plain and ordinary meaning	“a logically or physically separate data store that provides a history of prior communications and attempted communications of a single event type and is automatically updated without user input”

-1172 Case, United States Patent No. 9,336,320 (Disputed)		
Claim Term/Phrase	Plaintiff's Construction	Defendant's Construction
<p>“presented in a manner indicating that the at least one menu item is unavailable” (Claims 1, 10)</p> <p>(Proposed by Defendant)</p>	Plain and ordinary meaning	<p>“graphically depicting a previously selectable menu item that cannot be selected; removing the menu item is not graphically depicting”</p>
<p>“the menu items are associated with the two or more different services” (Claims 1, 10)</p> <p>(Proposed by Defendant)</p>	Plain and ordinary meaning	<p>“the menu items are each associated with at least two different services”</p>

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Respectfully submitted,

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Certificate of Service

I hereby certify that on November December 6, 2021, I electronically filed the foregoing using the Court's Case Management and Electronic Case Filing system, which will send notification of such filing to counsel of record as registered in the Court's system.

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